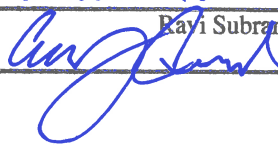


Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

October 10, 2024
Ravi Subramanian, Clerk
By  Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff

v.

1. MARQUIS JACKSON,
2. MARKELL JACKSON,
3. MANDEL JACKSON,
4. EDGAR VALDEZ,
5. KEONDRE JACKSON,
6. MICHAEL YOUNG,
7. SIR TERRIQUE MILAM,
8. TYRELL LEWIS,
9. ROBERT JOHNSON,
10. MATELITA JACKSON,
11. MIRACLE PATU-JACKSON,
12. DIYANA ABRAHA,
13. ADEAN BATINGA,
14. TIANNA KARASTAN,
15. ROBERT BELLAIR,
16. RONALD FINKBONNER,
17. PATRICK JAMES,
18. THOMAS MORRIS,
19. CHAD CONTI, and
20. PHILLIP LAMONT ALEXANDER,

Defendants.

NO. CR24-164 JNW

SUPERSEDING INDICTMENT

1 The Grand Jury charges that:

2 **COUNT 1**

3 **(Conspiracy to Distribute Controlled Substances)**

4 Beginning at a time unknown, and continuing until at least October 2, 2024, in
5 King, Pierce, Snohomish, and Whatcom Counties, within the Western District of
6 Washington, and elsewhere, MARQUIS JACKSON, MARKELL JACKSON, MANDEL
7 JACKSON, EDGAR VALDEZ, KEONDRE JACKSON, MICHAEL YOUNG, SIR
8 TERRIQUE MILAM, TYRELL LEWIS, ROBERT JOHNSON, MIRACLE
9 PATU-JACKSON, DIYANA ABRAHA, ADEAN BATINGA, TIANNA KARASTAN,
10 ROBERT BELLAIR, RONALD FINKBONNER, PATRICK JAMES, THOMAS
11 MORRIS, CHAD CONTI, PHILLIP LAMONT ALEXANDER, and others known and
12 unknown, did knowingly and intentionally conspire to distribute controlled substances,
13 including: N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (fentanyl), N-(4-
14 fluorophenyl)-N-[1-(2-phenylethyl)-4-piperidinyl]propenamide (p-fluorofentanyl – a
15 fentanyl analogue), and methamphetamine, substances controlled under Title 21, United
16 States Code.

17 The Grand Jury further alleges that with respect to MARQUIS JACKSON,
18 MARKELL JACKSON, MANDEL JACKSON, EDGAR VALDEZ, KEONDRE
19 JACKSON, MICHAEL YOUNG, SIR TERRIQUE MILAM, TYRELL LEWIS,
20 ROBERT JOHNSON, ROBERT BELLAIR, RONALD FINKBONNER, PATRICK
21 JAMES, THOMAS MORRIS, CHAD CONTI, and PHILLIP LAMONT ALEXANDER
22 their conduct as members of the conspiracy charged in Count 1, which includes the
23 reasonably foreseeable conduct of other members of the conspiracy charged in Count 1,
24 involved 400 grams or more of a mixture or substance containing fentanyl, in violation of
25 Title 21, United States Code, Sections 841(b)(1)(A).

1 The Grand Jury further alleges that with respect to MARQUIS JACKSON,
2 MARKELL JACKSON, MANDEL JACKSON, EDGAR VALDEZ, KEONDRE
3 JACKSON, MICHAEL YOUNG, SIR TERRIQUE MILAM, TYRELL LEWIS, and
4 ROBERT JOHNSON, their conduct as members of the conspiracy charged in Count 1,
5 which includes the reasonably foreseeable conduct of other members of the conspiracy
6 charged in Count 1, involved 100 grams or more of a mixture and substance containing a
7 detectable amount of any fentanyl analogue, in violation of Title 21, United States Code,
8 Sections 841(b)(1)(A).

9 The Grand Jury further alleges that with respect to EDGAR VALDEZ, their
10 conduct as members of the conspiracy charged in Count 1, which includes the reasonably
11 foreseeable conduct of other members of the conspiracy charged in Count 1, involved 50
12 grams or more of methamphetamine, its salts, isomers, or salts of its isomers, and 500
13 grams or more of a mixture or substance containing a detectable amount of
14 methamphetamine, its salts, isomers, or salts of its isomers, in violation of Title 21,
15 United States Code, Sections 841(b)(1)(A).

16 All in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(C),
17 and 846.

18 COUNT 2

19 (Conspiracy to Commit Money Laundering)

20 A. The Conspiracy

21 Beginning at a time unknown, and continuing until at least October 2, 2024, in
22 King, Pierce, Snohomish, and Whatcom Counties, within the Western District of
23 Washington, and elsewhere, MARQUIS JACKSON, MARKELL JACKSON,
24 MATELITA JACKSON, DIYANA ABRAHA, and others known and unknown, did
25 knowingly combine, conspire, and agree with each other and with other persons known
26
27

and unknown to the Grand Jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956, to wit:

1. To knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, Conspiracy to Distribute Controlled Substances as charged in Count 1, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i); and

2. To knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved the proceeds of specified unlawful activity, that is, Conspiracy to Distribute Controlled Substances as charged in Count 1, knowing that the transactions were designed in whole or in part to avoid a transaction reporting requirement under State or Federal Law, and that while conducting and attempting to conduct such financial transactions, knew that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(ii).

All in violation of Title 18, United States Code, Section 1956(h).

COUNT 3

(Distribution of a Controlled Substance)

On or about October 31, 2023, in Snohomish County, within the Western District of Washington, and elsewhere, MARKELL JACKSON, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a

1 controlled substance, including: fentanyl and p-fluorofentanyl (a fentanyl analogue),
2 substances controlled under Title 21, United States Code.

3 The Grand Jury further alleges that the offense involved 400 grams or more of a
4 mixture or substance containing fentanyl.

5 The Grand Jury further alleges that the offense involved 100 grams or more of a
6 mixture and substance containing a detectable amount of any fentanyl analogue.

7 The Grand Jury further alleges that this offense was committed during and in
8 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled
9 Substances).

10 All in violation of Title 21, United States Code, Sections 841(a)(1) and
11 841(b)(1)(A), and Title 18, United States Code, Section 2.

12 **COUNT 4**

13 **(Distribution of a Controlled Substance)**

14 On or about December 7, 2023, in Snohomish County, within the Western District
15 of Washington, and elsewhere, MARKELL JACKSON, and others known and unknown,
16 did knowingly and intentionally distribute, and aid and abet the distribution of, a
17 controlled substance, including: fentanyl, a substance controlled under Title 21, United
18 States Code.

19 The Grand Jury further alleges that the offense involved 400 grams or more of a
20 mixture or substance containing fentanyl.

21 The Grand Jury further alleges that this offense was committed during and in
22 furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled
23 Substances).

24 All in violation of Title 21, United States Code, Sections 841(a)(1) and
25 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 5**(Distribution of a Controlled Substance)**

On or about March 7, 2024, in Snohomish County, within the Western District of Washington, and elsewhere, MARKELL JACKSON, ADEAN BATINGA, ROBERT JOHNSON, and others known and unknown, did knowingly and intentionally distribute, and aid and abet the distribution of, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

COUNT 6**(Possession with Intent to Distribute a Controlled Substance)**

On or about December 7, 2023, in Whatcom County, within the Western District of Washington, and elsewhere, ROBERT BELLAIR, MARKELL JACKSON, and others known and known, did knowingly and intentionally possess, and aid and abet the possession of, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 400 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A), and Title 18, United States Code, Section 2.

COUNT 7

(Possession with Intent to Distribute a Controlled Substance)

On or about February 9, 2023, in Whatcom County, within the Western District of Washington, and elsewhere, RONALD FINKBONNER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl and methamphetamine, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and 841(b)(1)(C).

COUNT 8

(Possession with Intent to Distribute a Controlled Substance)

On or about July 22, 2024, in Whatcom County, within the Western District of Washington, and elsewhere, RONALD FINKBONNER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl and methamphetamine, substances controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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COUNT 9

(Possession with Intent to Distribute a Controlled Substance)

On or about August 21, 2024, in Whatcom County, within the Western District of Washington, and elsewhere, PATRICK JAMES did knowingly and intentionally possess, and aid and abet the possession of, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B) and Title 18, United States Code, Section 2.

COUNT 10

(Possession with Intent to Distribute a Controlled Substance)

On or about October 4, 2023, in Whatcom County, within the Western District of Washington, and elsewhere, THOMAS MORRIS did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that the offense involved 40 grams or more of a mixture or substance containing fentanyl.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

COUNT 11

(Possession with Intent to Distribute a Controlled Substance)

On or about October 2, 2024, in King County, within the Western District of Washington, and elsewhere, CHAD CONTI did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 12

(Possession with Intent to Distribute a Controlled Substance)

On or about October 2, 2024, in Whatcom County, within the Western District of Washington, and elsewhere, PHILLIP LAMONT ALEXANDER did knowingly and intentionally possess, with the intent to distribute, a controlled substance, including: fentanyl, a substance controlled under Title 21, United States Code.

The Grand Jury further alleges that this offense was committed during and in furtherance of the offense alleged in Count 1 (Conspiracy to Distribute Controlled Substances).

All in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

FORFEITURE ALLEGATION

The allegations contained in Counts 1 through 12 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

1 Upon conviction of any of the offenses alleged in Counts 1, and 3 through 12,
2 MARQUIS JACKSON, MARKELL JACKSON, MANDEL JACKSON, EDGAR
3 VALDEZ, KEONDRE JACKSON, MICHAEL YOUNG, SIR TERRIQUE MILAM,
4 TYRELL LEWIS, ROBERT JOHNSON, MIRACLE PATU-JACKSON, DIYANA
5 ABRAHA, ADEAN BATINGA, TIANNA KARASTAN, ROBERT BELLAIR,
6 RONALD FINKBONNER, PATRICK JAMES, THOMAS MORRIS, CHAD CONTI,
7 and PHILLIP LAMONT ALEXANDER shall forfeit to the United States, pursuant to
8 Title 21, United States Code, Section 853(a), any property constituting or derived from
9 proceeds traceable to the offense, as well as any property used or intended to be used to
10 facilitate the offense. Such property includes, but is not limited to:

- 11 a. Approximately \$25,000 in U.S. currency, seized on or about August 18, 2024,
12 from EDGAR VALDEZ's residence in Phoenix, Arizona;
- 13 b. Two Rolex watches, seized on or about August 18, 2024, from EDGAR
14 VALDEZ's residence in Phoenix, Arizona;
- 15 c. One gold necklace, seized on or about August 18, 2024, from EDGAR
16 VALDEZ's residence in Phoenix, Arizona; and
- 17 d. One black Ruger LCP, and any associated ammunition, seized on or about
18 August 18, 2024, from a residence used by EDGAR VALDEZ, in Avondale,
19 Arizona.

20 Upon conviction of the offense alleged in Count 2, MARQUIS JACKSON,
21 MARKELL JACKSON, MATELITA JACKSON, and DIYANA ABRAHA, shall forfeit
22 to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), any
23 property, real or personal, involved in the offense, or any property traceable to such
24 property.

Substitute Assets. If any of the above-described forfeitable property, as a result of any act or omission of the defendants,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek the forfeiture of any other property of the defendant, up to the value of the above-described forfeitable property, pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL: *yes*
DATED: *10/10/2024*

Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of the United States.

FOREPERSON



TESSA M. GORMAN
United States Attorney



VINCENT T. LOMBARDI
Assistant United States Attorney



ZACHARY W. DILLON
Assistant United States Attorney